

1 DENNIS M. PRINCE
2 Nevada Bar No. 5092
2 KEVIN T. STRONG
3 Nevada Bar No. 12107
3 **PRINCE LAW GROUP**
4 10801 West Charleston Boulevard
Suite 560
5 Las Vegas, Nevada 89135
Tel: (702) 534-7600
Fax: (702) 534-7601
6 Email: eservice@thedplg.com
Attorneys for Plaintiff
7 *Debbie Siegfried*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DEBBIE SIEGFRIED, individually,

Case No. 2:20-cv-01905-KJD-DJA

11 Plaintiff,

12 vs.

14 LOYA INSURANCE COMPANY, a
15 Foreign Corporation; and JESS LOPEZ,
individually, DOES I through X and ROE
16 BUSINESS ENTITIES I through X,
inclusive,

17 Defendant.

18
**STIPULATION AND ORDER OR
EXTENTION OF TIME TO FILE
REPLY TO LOYA INSURANCE
COMPANY'S OPPOSITION TO
PLAINTIFF'S MOTION TO REMAND**

(First Request)

19 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff DEBBIE
20 SIEGFRIED, through her counsel of record, Dennis M. Prince and Kevin T. Strong of
21 PRINCE LAW GROUP, and Defendant LOYA INSURANCE COMPANY, by and
22 through its counsel of record, M. Bradley Johnson and Kristopher T. Zeppenfeld of
23 KRAVITZ SCHNITZER & JOHNSON, CHTD, that the deadline for Plaintiff to file her
24 Reply to Loya Insurance Company's Opposition to Plaintiff's Motion to Remand (ECF
25 No. 6) shall be extended by fourteen (14) days, from November 9, 2020 to November 23,
26 2020. The Opposition was filed on November 2, 2020. This is the first request for
27 extension of time to file a reply to this opposition.



Over the course of the last couple of weeks, Plaintiff's counsel has been handling briefing due in multiple matters, which has required substantial time and effort. Given the depth and number of arguments set forth in Loya Insurance Company's response to Plaintiff's Motion to Remand, a brief extension of time will ensure all those arguments are fully addressed to aid this Court in its decision.

Accordingly, the parties respectfully request this Court to approve the foregoing stipulation. This requested extension is not made in bad faith or to unnecessarily delay these proceedings.

DATED this 6th day of November, 2020.

DATED this 6th day of November, 2020

PRINCE LAW GROUP

**McCORMICK, BARSTOW,
SHEPPARD, WAYTE & CARRUTH
LLP**

/s/ *Kevin T. Strong*
DENNIS M. PRINCE
Nevada Bar No. 5092
KEVIN T. STRONG
Nevada Bar No. 12107
10801 W. Charleston Boulevard,
Suite 560
Las Vegas, Nevada 89135
Attorneys for Plaintiff
Debbie Siegfried

/s/ Kristopher T. Zeppenfeld
M. BRADLEY JOHNSON
Nevada Bar No. 4646
KRISTOPHER T. ZEPPENFELD
Nevada Bar No. 12144
8985 S. Eastern Avenue, Suite 200
Las Vegas, Nevada 89123
Attorneys for Defendant
Loya Insurance Company

ORDER

IT IS SO ORDERED.

DATED this 9th day of November, 2020.



UNITED STATES DISTRICT JUDGE

